

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
1:16-CV-01368-WO-LPA**

AMY BRYANT, M.D., M.S.C.R.; BEVERLY )  
GRAY, M.D.; ELIZABETH DEANS, M.D., )  
on behalf of themselves and their patients )  
seeking abortions; and PLANNED )  
PARENTHOOD SOUTH ATLANTIC, on )  
behalf of itself, its staff, and its patients )  
seeking abortions, )

Plaintiffs,

v.

JIM WOODALL, in his official capacity as )  
District Attorney (“DA”) for Prosecutorial )  
District (“PD”) 15B, ROGER ECHOLS, in )  
his official capacity as DA for PD 14; )  
ELEANOR E. GREENE, M.D., M.P.H., in )  
her official capacity as President of the )  
North Carolina Medical Board; RICK )  
BRAJER, in his official capacity as Secretary )  
of the North Carolina Department of Health )  
and Human Services; and their employees, )  
agents, and successors. )

Defendants. )

DEFENDANTS’ RESPONSE  
IN OPPOSITION TO THE  
PLAINTIFFS’ MOTION FOR  
CLARIFICATION

The defendants hereby respectfully respond in opposition to the plaintiffs’  
Motion for Clarification [Dkt. # 86] as follows:

1. The defendants believe that this Court’s Memorandum Opinion and  
Order [Dkt. # 84] is not ambiguous or unclear as written and that it requires no  
further clarification.

2. The defendants also believe that the plaintiffs' Motion for Clarification is, in reality, a motion asking the Court to reconsider its Memorandum Opinion and Order, to modify that document and to grant the plaintiffs some form of relief in addition to that already granted by the Court.

3. Accordingly, the defendants oppose the plaintiffs' Motion.

Respectfully submitted this 9<sup>th</sup> day of May 2019.

JOSHUA H. STEIN  
Attorney General

/s/ I. Faizon Hicks  
I. Faizon Hicks  
Special Deputy Attorney General

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CERTIFICATE OF COMPLIANCE WITH RULE 7.3(d)

Undersigned counsel certifies that the present filing is in compliance with Local Rule 7.3(d) of the Rules of Practice and Procedure of the United States District Court for the Middle District of North Carolina, in that this filing, including the body of the brief, heading and footnotes, contains no more than 6,250 words as indicated by Word, the program used to prepare this brief.

Electronically submitted this 9<sup>th</sup> day of May 2019.

/s/ I. Faison Hicks

I. Faison Hicks

Special Deputy Attorney General

*Attorney for the Defendants*

CERTIFICATE OF SERVICE

This is to certify that, on the 9<sup>th</sup> day of May 2019, I caused a copy of the foregoing to be electronically filed with the Office of the Clerk of Court of the United States District Court for the Middle District of North Carolina using the CM/ECF system, which will automatically send notification of such filing to all counsel of record who have appeared in this case.

/s/ I. Faison Hicks

I. Faison Hicks  
Special Deputy Attorney General  
*Attorney for the Defendants*